

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	1:25-cr-00007-JMS-TAB
)	
REINA ISOM,)	
)	
Defendant.)	

**DEFENDANT’S MOTION TO CONTINUE
CHANGE OF PLEA/SENTENCING HEARING**

Defendant Reina Isom, by counsel Denise L. Turner, respectfully moves the Court to continue the change of plea/sentencing hearing, and in support states:

1. The change of plea/sentencing hearing is scheduled to commence on May 1, 2025 at 10:00 a.m. Any sentencing memos are due to be filed with the Court on or before April 24, 2025.
2. Counsel needs additional time to prepare for sentencing. Due to issues with the Defendant’s phone, counsel was unable to meet with the Defendant to discuss the sentencing until April 17, 2025. During that meeting, the Defendant provided counsel with the names of several individuals who would have information relevant for sentencing. Counsel needs additional time to interview these witnesses and complete the sentencing memorandum.
3. Assistant United States Attorney Adam Eakman has advised undersigned counsel that he has no objection.
4. The ends of justice served by the continuance sought herein outweigh the

best interests of the public and the defendant to a speedy trial. Thus the delay in the trial date attributable to this request for continuance is excludable under 18 U.S.C. 3161 et seq.

WHEREFORE, Defendant Reina Isom, requests that the change of plea/sentencing date of May 1, 2024, be vacated, and that this case be reset for change of plea/sentencing at such other time as the court's calendar will permit.

Respectfully submitted,

Denise L. Turner
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CERTIFICATE OF SERVICE

I certify that on April 15, 2025, a copy of the foregoing was filed electronically. Notice of this filing will be sent to the parties of record by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

Denise L. Turner
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